



**Lowenstein  
Sandler**

**Natalie J. Kraner**  
Senior Public Interest Counsel

One Lowenstein Drive  
Roseland, New Jersey 07068

T: 973 422 6722  
F: 973 422 6723  
E: nkraner@lowenstein.com

June 10, 2021

**VIA ECF**

Honorable Michael A. Hammer, U.S.M.J.  
United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

**Re: *Kellerman v. City of East Orange and County of Essex, et al.***  
**Civil Action No. 2:18-4124 (MCA) (MAH)**

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Dear Judge Hammer:

In accordance with the Court's June 3, 2021 Order (ECF No. 93), Plaintiff Kerri F. Kellerman and Defendants respectfully submit this joint letter to notify the Court that the parties have reached an agreement in principle to resolve all claims. As Your Honor is aware, Plaintiff and the City of East Orange reached an oral agreement prior to the May 6 conference, and the parties are now reviewing and exchanging drafts of the written agreement.

Plaintiff and the Essex County Defendants have similarly reached an agreement in principle. Under the terms of the settlement, Essex County will pay Ms. Kellerman a monetary award and agree to be bound by the terms of New Jersey Attorney General Law Enforcement Directive No. 2019-3, dated November 20, 2019 ("Directive"), regarding law enforcement interactions with transgender individuals. Although Essex County and Plaintiff have agreed on the monetary component of the settlement, they have not yet exchanged drafts of a written agreement that would memorialize the settlement, including, among other things, the provisions relating to Essex County's agreement to abide by the Directive. The parties will continue to inform the Court of the status of negotiations, and thank Your Honor for his consideration.

Respectfully submitted,

**Lowenstein Sandler LLP**  
*Counsel for Kerri F. Kellerman*

/s/ Natalie J. Kraner  
Natalie J. Kraner, Esq.

**Assistant Essex County Counsel**  
*Counsel for County of Essex Defendants*

/s/ Alan Ruddy  
Alan Ruddy, Esq.

**The Law Office of Christopher M. Pisacane, LLC**  
*Counsel for The City of East Orange*

/s/ Christopher M. Pisacane  
Christopher M. Pisacane